

EXHIBIT AJ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

CONTINENTAL CASUALTY COMPANY,
TRANSCONTINENTAL INSURANCE COMPANY,
TRANSPORTATION INSURANCE COMPANY, VALLEY
FORGE INSURANCE COMPANY, NATIONAL FIRE
INSURANCE COMPANY OF HARTFORD and
AMERICAN CASUALTY COMPANY OF
READING, PENNSYLVANIA.

04 CV 05970
04 Civ.

Plaintiffs,

- against -

COMPLAINT

JURY TRIAL
DEMANDED

AL QAEDA ISLAMIC ARMY
EGYPTIAN ISLAMIC JIHAD
OSAMA BIN LADEN
ESTATE OF MUHAMMAD ATEF
AYMAN AL ZAWAHIRI
ABU ZUBAYDAH a/k/a ZAYN AL ABIDIN MUHAMMAD HUSAYN TARIQ
SAIF AL ADEL a/k/a SAYF AL ADL
KHALID SHEIKH MOHAMMED
ABDULLAH AHMED ABDULLAH
ESTATE OF ABU HAFS a/k/a Khaled Al Shanguiti,
a/k/a Mafuz Ould Al Walid, "THE MAURITANIAN"
ESTATE OF ABU SALAH AL-YEMENI
ESTATE OF ABU JAFFER AL-JAZIRI
a/k/a OMAR CHEBBANI
MUHSIN MUSA MATWALLI ATWAH
ANAS AL LIBY
IBN AL-SHAYKH AL-LIBI
FAZUL ABDULLAH MOHAMMED
AHMED MOHAMED HAMED ALI
MOHAMED SULEIMAN AL NALFI
MUSTAFA MOHAMED FADHIL
AHMED KHALFAN GHAILANI
FAHID MOHAMMED ALLY MSALAM
SHEIKH AHMED SALIM SWEDAN
MUHAMMAD ABU-ISLAM
ABDULLAH QASSIM
MUSTAFA MUHAMMED AHMAD a/k/a Shaykh Sai'id
a/k/a Mustafa Ahmed Al-Hasawi
JAMAL AL-BADAWI

FILED
U.S. DISTRICT COURT
2004 SEP - 1 PM 3:55
S.D. OF N.Y.

MOHAMMED OMAR AL-HARAZI
WALID AL-SOUROURI
FATHA ADBUL RAHMAN
YASSER AL-AZZANI
JAMAL BAKHORSH
AHMAD AL-SHINNI
RAED HIJAZI
JAMIL QASIM SAEED
ABU ABDUL RAHMAN
MOHAMED BAYAZID
ABU MUSAB ZARQAWI
SHEIKH OMAR BAKRI MUHAMMAD
ABDUL FATTAH ZAMMAR
MAMOUN DARKAZANLI
GHASOUB AL ABRASH GHALYOUN (a/k/a ABU MUSAB)
BENSAYAH BELKACEM
SABIR LAMAR
WADIH EL-HAGE
WALI KHAN AMIN SHAH
ABU SAYEF GROUP (ASG)
JEMAAH ISLAMIYA a/k/a Jam'yah Ta'awun Al Islamia
ALGERIAN ARMED ISLAMIC GROUP (GLA)
EGYPTIAN GAMA'A AL-ISLAMIYA
THE ESTATE OF MARWAN AL- SHEHHI
THE ESTATE OF FAYEZ AHMED
THE ESTATE OF AHMED AL GHAMDI
THE ESTATE OF HAMZA AL GHAMDI
THE ESTATE OF MOHALD AL SHEHRI
THE ESTATE OF SATAM M. A. AL SUQAMI
THE ESTATE OF ABDULAZIZ AL OMARI
THE ESTATE OF WALEED M. AL SHEHRI
THE ESTATE OF WAIL AL SHEHRI
THE ESTATE OF MOHAMMED ATTA
THE ESTATE OF KHALID AL MIDHAR
THE ESTATE OF NAWAF AL HAZMI
THE ESTATE OF HANI HANJOUR
THE ESTATE OF SALEM AL HAZMI
THE ESTATE OF MAJED MOQED
THE ESTATE OF ZIAD SAMIR JARRAH
THE ESTATE OF AHMED IBRAHIM A. AL HAZNAWI
THE ESTATE OF SAEED AL GHAMDI
THE ESTATE OF AHMED AL NAMI
ZACARIAS MOUSSAOUI
THE TALIBAN
MUHAMMAD OMAR
MAULVI ABDUL KABIR

JALIL SHINWARI
NOOR JALIL
SADDAM HUSSEIN
ESTATE OF QUSAY HUSSEIN
ESTATE OF UDAY HUSSEIN
TAHA YASSIN RAMADAN
MUHAMMED MAHDI SALAH
FARUQ AL-HIJAZI
SALAH SULEIMAN
AHMED KHALIL IBRAHIM SAMIR AL-AM
HABIB FARIS ABDULLAH AL-MAMOURI
ABDEL HUSSEIN a/k/a The Ghost
ABU AGAB
THE REPUBLIC OF SUDAN
MINISTRY OF DEFENSE OF THE REPUBLIC OF SUDAN
MINISTRY OF INTERIOR OF THE REPUBLIC OF SUDAN
SUDANESE INTELLIGENCE SERVICE
NATIONAL ISLAMIC FRONT
HASSAN AL TURABI, Islamic leader
OMAR HASSAN AHMAD AL-BASHIR, President of Sudan
ABDUL RAJEM MOHAMMED HUSSEIN, Interior Minister
ABDEL WAHAB OSMAN, former Sudanese Minister of Industry
ISS EL-DIN EL SAYED, Minister of Finance and National Economy
RAHMAN ABDUL SIRAL-KHATIM, Minister of Defense
AL AMN AL-DAKHILI, Intelligence
AL AMN AL-KHARIJI, Intelligence
FAISAL ISLAMIC BANK
ISLAMIC REPUBLIC OF IRAN
ISLAMIC REVOLUTIONARY GUARD ("IRGC")
IRANIAN MINISTRY OF INTELLIGENCE AND SECURITY ("MOIS")
LASHKAR FEDAYAN-E-ISLAMI (ISLAMIC MARTYRS BRIGADE)
AYATOLLAH ALI KHAMENEI, Spiritual Leader of Iran
MOMMAMED MOHAMMADI RAYSHAHI, special advisor to Spiritual Leader
QORBAN ALI NAJAF-ABADI, Minister of Intelligence
ALI FALAHYAN, Director of Public Intelligence
GENERAL ALI BLOKIAN, former advisor to Hezbollah
AHMAD SALAH (SALIM), member of committee of three of int'l Hezbollah
MAHDI CHAMRAN SAVEHI, director of International
Hezbollah and Iranian External Intelligence chief
GENERAL MOHSEN REZA'I, Iranian security director
HOSEYN SHAYKH OL—ESLAM, former Assistant Foreign Minister
GENERAL MOHSEN REZA'I, former commander of the Islamic Revolutionary
Guard Corps (IROC) who is now in charge of the reorganization of Iran's security apparatus
GENERAL YAHYA RAHIM SAFAVI, head of the IRGC
QORBAN 'ALI NAJAF 'ABADI, Minister of Information
ALI FALAHYAN, former Minister

MOHAMMED MOHAMMADI RAYSHAHRI, special adviser to Iran's supreme leader Ali Khamene'i

CO-CONSPIRATORS

ABD AL-HADI AL-IRAQI

ABD AL-MUSHIN AL-LIBI

ABDUL RAHMAN KHALID BIN MAHFOUZ

ABDUL RAHMAN YASIN

ABDULLA AL OBALID

ABDULA BIN LADEN

ADVICE AND REFORMATION COMMITTEE

AFGHAN SUPPORT COMMITTEE (ASC)

AHMED NUR ALI JUMALE a/k/a Ahmed Nur Ali Jim'ale

AL KHALEEJIA FOR EXPERT PROMOTION AND MARKETING COMPANY

AL RASHID TRUST

AL-BARAKAAT GROUP OF COMPANIES SOMALIA LIMITED

BARAKAAT GROUP OF COMPANIES

AL-GAMMAAH AL ISLAMIAH

AL-HARAMAIN ISLAMIC FOUNDATION

ALI GHALEB HIMMAT

BENEVOLENCE INTERNATIONAL FOUNDATION, INC.

ENAAM M. ARNANOUT

GLOBAL RELIEF FOUNDATION, INC.

INTERNATIONAL ISLAMIC RELIEF ORGANIZATION (IIRO)

INTERNATIONAL INSTITUTE OF ISLAMIC THOUGHT (IIT)

ISLAMIC ARMY FOR THE LIBERATION OF HOLY PLACES

ISLAMIC CULTURAL INSTITUTE OF MILAN

ISLAMIC RESCUE ORGANIZATION

JAMAL BARZINJI

KHALED BIN SALIM BIN MAHFOUZ

MOHAMED MANSOUR

MOHAMMED JAMAL KHALIFA

MOHAMMED SALIM BIN MAHFOUZ

MUFTI MOHAMMED RASHID a/k/a RASHID

MUHAMMAD SALAJI

MUSLIM WORLD LEAGUE

MUWAFFAQ FOUNDATION a/k/a BLESSED RELIEF FOUNDATION

NATIONAL COMMERCIAL BANK OF SAUDI ARABIA

PRINCE NAYEF BIN ABDULAZIZ AL SAUD

PRINCE SULTAN BIN ABDULAZIZ AL SAUD

RABIH HADDAH

RABITA TRUST

SAAR FOUNDATION

SAFIQ AYADI

SAUDI SUDANESE BANK

AL SHAMAL ISLAMIC BANK

SHEIKH ABU ABDUL AZIZ NAGI

SHEIK ADEL GALIL BATTERJEE a/k/a Batargy
SULEIMAN ABDEL AZIZ AL RAJHI
TABA INVESTMENTS
TANZANITE KING
ULEMA UNION OF AFGHANISTAN
WADI AL AQIQ
WAFI HUMANITARIAN ORGANIZATION
WORLD ASSEMBLY FOR MUSLIM YOUTH
WORLD ASSEMBLY OF ISLAMIC YOUTH
YASSIN AL-QADI a/k/a YASSIN AL-KADI
YOUSAF AHMED ALI
INFOCUS TECH OF MALAYSIA
YAZID SUFAAT OF KUALA LUMPUR MALAYSIA
AL-SHAYKH AL-IRAQI
ABU HAJER AL IRAQI
PRINCE MOHAMMED AL FAISAL AL SAUD
AL-HIJRAH CONSTRUCTION AND DEVELOPMENT LTD.
GUM ARABIC CO. LTD.
AL SHAMAL FOR INVESTMENT AND DEVELOPMENT
SALEH ABDULLAH KAMEL
SAUDI DALLAH AL BARAKA GROUP LLC.
OMAR ABDULLAH KAMEL
AL BARAKA INVESTMENT AND DEVELOPMENT
DALLAH AL BARAKA GROUP LLC
ISLAMIC INVESTMENT COMPANY OF THE GULF
DAR-AL-MAAL AL ISLAMI
AL-BIR SAUDI ORGANIZATION
MOHAMMAD S. MOHAMMAD
TADAMON ISLAMIC BANK
NATIONAL ISLAMIC FRONT PARTY
MAMDOUH MAHMUD SALIM
LEBANESE HEZBOLLAH
PALESTINE ISLAMIC JIHAD
HAMAS
MUSTASIM ABDEL-RAHIM
ABDEL WAHAB OSMAN
SUDANESE GOVERNMENT OF NORTHERN STATE
NATIONAL FUND FOR SOCIAL INSURANCE
RANMAN ABDUL SIRAL-KHATIM
ABDUL-RAHIM MOHAMMED HUSSEIN
AL AMN AL-DAKHILI
AL AMN AL-KHARIJI
ABD AL SAMAD AL-TA'ISH
MOHAMED SADEEK ODEH
ABDEL BARRY
AHMED THE GERMAN

GULBUDDIN HEKMATYAR
IMAD MUGHNIYEH
MAHDI CHAMRAIN SAVEHI
MOHAMMED SARKAWI
AL TAWHID
HAJ MOHAMAD AKRAM
MOUNIR EL-MOTASSADEQ
RAMZI MOHAMMED ADBULLAH BIN AL SHIBH
a/k/a Ramzi Mohamed Abdallah Omar
ZAKARIYA ESSABAR
SAID PAHAJI
UMAR FARUQ
IBN SHEIK AL-LIBI
ABDELGHANI MZOUDI
ABD AL-RAHIM AL-NASHIRI a/k/a Bilal Bin Marwan
a/k/a Umar Mohammed al-Harazi a/k/a Abu Bilal al-Makki, Mullalh Bilal
PRINCE TURKI AL FAISAL AL SAUD
PRINCE ABDULLAH AL FAISAL BIN ABDULAZIZ AL SAUD (PRINCE ABDULLAH)
PRINCE SALMAN IBN ABDUL AZIZ (PRINCE SALMAN)
ZOUAYDI (MUHAMMED GALEB KALAJE ZOAAAYDI a/k/a ABU TALHA)
MULLAH KREKAR
ABDULAZIS BIN ABDUL RAHMAN AL SAUD
ARAFAT EL-ASAHI
HAYDAR MOHAMED BIN LADEN
MOHAMMED BIN ABDUL RAHMAN AL ARIEFY
FAISAL GROUP HOLDING CO.
ALFAISALIAH GROUP
BASHSH HOSPITAL
MUSHAYT FOR TRADING ESTABLISHMENT
ABDULLAH BIN ABDUL MUHSEN AL TURKI (AL TURKI)
SAUDI HIGH COMMISSION (a/k/a The Saudi High Relief Commission)
TAREK AYOUBI
AL ANWA
HELP AFRICAN PEOPLE
IBRAHIM BIN ABDUL AZIZ AL IBRAHIM FOUNDATION
IBRAHIM BIN ABDUL AZIZ
MERCY INTERNATIONAL RELIEF AGENCY
ISLAMIC MOVEMENT OF UZBEKISTAN (IMU)
SAUDI BIN LADEN GROUP (SBG) a/k/a BIN LADEN CORPORATION
BAKR M. BIN LADEN
SALEH GAZAZ
MOHAMMED BAHARETH
ABDULLAH BIN SAID
MOHAMMED NUR RAHIMI
TAREK M. BIN LADEN
OMAR M. BIN LADEN

SALEH MOHAMED BIN LADEN
SAUDI BIN LADEN INTERNATIONAL COMPANY
YESLAM M. BIN LADEN
GLOBAL DIAMOND RESOURCE
TALAL MOHAMMED BADKOOK
MOHAMAN ALI ELGARI
NEW DIAMOND HOLDINGS
M.M. BADKOOK CO. FOR CATERING & TRADING
AL-MUSTAQBAL GROUP
NATIONAL MANAGEMENT CONSULTANCY CENTER (NMCC)
AL-RAJHI BANKING & INVESTMENT CORPORATION
SALEH ABDULAZIZ AL-RAJHI
ABDULLAH SALAIMAN AL-RAJHI
KHALID SULAIMAN AL-RAJHI
SULAIMAN ABDUL AZIZ AL-RAJHI
AL-WATANIA POULTRY
MAR-JAC POULTRY
MAR-JAC INVESTMENTS, INC.
PIEDMONT POULTRY
SNCB CORPORATE FINANCE LTD.
SNCB SECURITIES LTD. IN LONDON
SNCB SECURITIES LTD. IN NEW YORK
SAUDI ECONOMIC AND DEVELOPMENT COMPANY
ZAKAT COMMITTEE
SAUDI RED CRESCENT COMMITTEE
ABDULKARIM KHALED UUSUF ABDULLAH
HISHAM (BROTHER OF ENAAM ARNANOUT)
SAIF AL ISLAM EL MASRY
BENEVOLENCE INTERNATIONAL FOUNDATION - U.S.A.
BENEVOLENCE INTERNATIONAL FOUNDATION - CANADA
BENEVOLENCE INTERNATIONAL FUND
SYED SULEMAN AHMER
MAZIN M.H. BAHARETH
SHAHIR ABDULRAOOF BATTERJEE
ZAHIR H. KAZMI
MUZAFFAR KHAN
SOLIMAN J. KHUDEIRA
JAMAL NYRABEH
SUCCESS FOUNDATION
ABDURAHMAN AL-AMOUDI
AMERICAN MUSLIM FOUNDATION (AMF)
MOHAMMED OMEISH
ADNAN BASIHA
MAHMOUD JABALLAH
ARAFAT EL-ASHI
MORO ISLAMIC LIBERATION FRONT (MILF)

MAHMOUD JABALLAH
MOHAMMED KHATIB
SAUDI JOINT RELIEF COMMITTEE
TAIBAH INTERNATIONAL AID ASSOCIATION
ISLAMIC AFRICAN RELIEF AGENCY
TARIK HAMDİ
FAZEN AHED
SANABIL AL-KHAIR
SANA-BELL, INC.
SANABEL AL-KHEER, INC.
KHALED NOURI
ABDULLAH M. AL-MAHDI
TAREQ M. AL-SWAIDAN
ABDUL AL-MOSLAH
SALAH BADAHDH
HASSAN A.A. BAHFZALLAH
M. YAQUB MIRZA
IHAB ALI
SAMIR SALAB
IBRAHİM HASSABELLA

ABU SULAYMAN
AHMED TOTONJI
HISHAM AL-TALIB
IQBAL YUNUS
M. OMAR A. SHRAF
MOHAMMED JAGHLIT
MUHAMMAD ASHRAF
SHERIF SEDKY
AFRICAN MUSLİM AGENCY
ARADI, INC.
GROVE CORPORATE, INC.
HERITAGE EDUCATION TRUST
MENA CORPORATION
RESTON INVESTMENTS, INC.
SAFA TRUST
STERLING CHARITABLE GIFT FUND
STERLING MANAGEMENT GROUP
YORK FOUNDATION
NATIONAL DEVELOPMENT BANK
DALLAH AVCO TRANS ARABIA CO. LD.
OMAR AL BAYOUMI (AKA ABU IMARD)
AL AQSA ISLAMIC BANK
AQEEL AL-AQEEL
MANSOUR AL-KADI
SOLİMAN H.S. AL-BUTHE

PEROUZ SEDA GHATY
AHMED IBRAHIM AL NAJJAR
ADEL MUHAMMAD SADIQ BIN KAZEM
SAUDI AMERICAN BANK
ABDULAZIZ BIN HAMAD
KHALIL A. KORDI
RASHID M. AL ROMAIZAN
ABDULAZIZ BIN HAMAD AL GOSAIBI
SAUDI CEMENT COMPANY IN DAMMAN
OMAR SULAIMAN AL-RAJHI
ARAB CEMENT COMPANY
MOHAMMED CHEHADE
HAZEM RAGAB
MOHAMMED ALCHURBAJI
MUSTAFA AL-KADIR
ABU AL-MAID
THIRWAT SALAH SHIHATA
ISLAMIC ARMY OF ADEN
MAMOUN DARKAZANLI IMPORT-EXPORT COMPANY
NURJAMAN RIDUAN ISMUDDIN a/k/a HAMBALI
MOHAMMED IQBAL ABDURRAHMAN a/k/a ABNU JIBRIL
FOUNDATION SECOURS MONDIAL
WA'EL HAMZA JULAIDAN a/k/a AL HASAN AL MADANI
ABDELKADIR MAHMOUD ES SAYED
KHALID AL FAWAZ
ABU HAMZA AL MASRI
MOHAMED BEN BELGACEM AOUBADI
MOKHTAR BOUCHOUCHA
TAREK CHARAABI
SAMI BEN KHEMAIS ESSID
LASED BEN HENI
SALAFIST GROUP FOR CALL AND COMBAT
AL-HAMATI SWEETS BAKERIES
AL-HUR HONEY PRESS SHOPS a/k/a AL-NUR HONEY CENTER
AL SHIFA' HONEY PRESS FOR INDUSTRY AND COMMERCE
MUHAMMAD AL-HAMATI a/k/a MOHAMMAD
HAMDY SADIQ AL-AHDAL a/k/a ABU ASIM AL-MAKKI
SAQAR AL JADAWI
AHMAD IBRAHIM AL-MUGHASSIL
AL ITIHAAD AL ISLAMIYA (AIAD)
AMIN AL HAQ a/k/a MUHAMMAD AMIN a/k/a AMIN UL IIAQ
ANSAR AL ISLAM a/k/a JUND AL ISLAM
ABU WA'EL a/k/a Sadoun Abdul Latif
AHMAD SA'ID AL KADR
ABDUL AZIZ AL IBRAHIM (or "AL IBRAHIM")
INTERNATIONAL DEVELOPMENT FOUNDATION

SULAIMAN AL-ALI
AHMED IDRIS NASREDDIN, a/k/a NASREDDIN AHMED IDRIS
AKIDA BANK PRIVATE LIMITED a/k/a AKIDA ISLAMIC BANK
INTERNATIONAL LIMITED a/k/a IKSIR INTERNATIONAL BANK LIMITED
AKIDA COMMODITY LIMITED
AKIDA INVESTMENT COMPANY LIMITED
AKIDA MANAGEMENT AND TRUST a/k/a AKIDA ISLAMIC BANKERS' TRUSTEE AND
MANAGEMENT
ALI GHALEB HIMMAT
AL TAQWA TRADE PROPERTY AND INDUSTRY COMPANY LIMITED,
a/k/a AL TAQWA TRADE PROPERTY AND INDUSTRY
ESTABLISHMENT, a/k/a HIMMAT ESTABLISHMENT
AL TAQWA ZAKA ESTABLISHMENT
ARMAND ALBERT FRIEDRICH HUBER a/k/a AHMED HUBER
ASAT TRUST REGISTERED
BA TAQWA FOR COMMERCE AND REAL ESTATE COMPANY LIMITED,
a/k/a BA TAQWA FOR COMMERCE AND REAL ESTATE
ESTABLISHMENT, a/k/a BEN M. NADA ESTABLISHMENT, a/k/a
YOUSSEF M. NADA ESTABLISHMENT
BANK AL TAQWA LIMITED, a/k/a AL TAQWA BANK
CEMSTEEL IMPEX ESTABLISHMENT
GULF CENTER S.R.L.
IKSIR LIMITED HOLDING
MIGA - MALAYSIAN SWISS, GULF AND AFRICAN CHAMBER,
a/k/a CAMERA DI COMMERCIO, INDUSTRIA E TURISMO PER GLI
STATI ARABI DEL GOLFO E LA SVIZZERA
MOHAMED MANSOUR, a/k/a MOHAMED AL-MANSOUR
NADA INTERNATIONAL ANSTALT, a/k/a NADA GROUP
INTERNATIONAL ANSTALT
NADA MANAGEMENT ORGANIZATION SA, a/k/a AL TAQWA
MANAGEMENT ORGANIZATION
NASCO BUSINESS RESIDENCE CENTER SAS
DI NASREDDIN AHMED IDRIS ED
NASCO NASREDDIN HOLDING SA
NASCOSERVICE S.R.L.
NASCOTEX S.A., a/k/a INDUSTRIE GENERALE DE FILATURE ET
TISSAGE, a/k/a INDUSTRIE GENERALE DE TEXTILE
NASREDDIN CHARITABLE FOUNDATION
NASREDDIN COMPANY NASCO SAS DI AHMED
IDRIS NASREDDIN EC
NASREDDIN FOUNDATION, a/k/a NASREDDIN STIFTUNG
NASREDDIN GROUP INTERNATIONAL HOLDING LIMITED
NASREDDIN INTERNATIONAL GROUP LIMITED HOLDING a/k/a
MIDDLE EAST AND TURKEY INVESTMENT HOLDING LIMITED
RAW MAT SERVICE AND MANAGEMENT SA
YOUSSEF MUSTAFA NADA

YOUSSEF M. NADA ESTABLISHMENT,
a/k/a YOUSSEF M. NADA ANSTALT
YOUSSEF M. NADA & CO. GESELLSCHAFT MBH
ZEINAB MANSOUR a/k/a ZEINAB MANSOUR FATTOUH,

Defendants.

-----X

Plaintiffs, by their attorneys, Ferber Frost Chan & Essner, LLP, allege as follows:

1. Plaintiffs bring this action to recover the damages they suffered as the result of the terrorist attacks on the World Trade Center Towers and the Pentagon perpetrated by some of the defendants with the support and assistance of the other defendants on September 11, 2001 (the “September 11, 2001 Attacks”).

JURISDICTION AND VENUE

2. This Court has jurisdiction of this action pursuant to 28 U.S.C. §§ 1330(a) (actions against foreign states), 1605(a)(2), 1605(a)(5), 1605(a)(7) (the Foreign Sovereign Immunities Act), and the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. §1961 et seq.

3. Venue is proper in this district pursuant to the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, Title IV, § 408(b)(3), designating the Southern District of New York as the exclusive venue for all civil litigation arising out of, or related to the September 11, 2001 Attacks, and 28 U.S.C. §§1391(b)(2) and 1391(f)(1) because a substantial number of acts, occurrences and injuries occurred in the Southern District of New York.

4. The claims against the foreign states of the SUDAN and IRAN through their instrumentalities and their official and unofficial employees, agents and servants alleged herein,

224. The German investigation revealed that in summer of 1999 or earlier, a group of Muslim students in Hamburg joined forces with the express goal of carrying out, in countries of Western culture, especially in the United States, the "Holy War" ("Jihad") by means of international terror. The group's members included MOHAMMED ATTA, MARWAN YOUSEF MOHAMED RASHED AL-SHEHHI (or "al-Shehhi"), and ZIAD SAMIR JARRAH (or "JARRAH") (hijackers, all of whom died in the course of the attacks), co-conspirators and Defendants RAMZI MOHAMMED ABDULLAH BIN AL SHIBH (a/k/a Ramzi Mohamed Abdallah Omar), ZAKARIYA ESSABAR, SAID BAHAJI, as well as MOUNIR EL-MOTASSADEQ.

225. Initially, the principal meeting point of the Hamburg cell was the apartment rented by ATTA, BAHAJI and BIN AL SHIBH in Hamburg-Marburg, which temporarily served as AL-SHEHHI's residence, too. EL-MOTASSADEQ, ESSABAR and JARRAH convened for meetings of the group at this location. In September 1999, the apartment AL-SHEHHI rented nearby served as an alternative base of operations. In October of 1999, after AL-SHEHHI and ATTA moved into the second apartment, it also became the primary address of EL-MOTASSADEQ.

226. In October of 1999 or earlier, the group's members finalized their terrorist scheme, which called for the use of airplanes in "jihad" to kill as many "infidels" in the United States as possible. In order to coordinate details and logistical support with the responsible representatives of the international terrorism network, they resolved to travel to Afghanistan in two groups.

ZOUAYDI referred to AL TURKI as "advisor to KING FAHID." AL TURKI's representative, Waleed Al Hussein, is the manager of a major Saudi company owned by the prominent shareholders.

292. THE SAUDI HIGH COMMISSION, (a/k/a the Saudi High Relief Commission) (or "SHC") was founded in 1993 by PRINCE SALMAN IBN ABDUL AZIZ (or "PRINCE SALMAN"), the Mayor of Riyadh and a son of King Fahd, and a prime supporter of the charity. Hailed as the largest fundraising effort in the Arab and Muslim world, the SAUDI HIGH COMMISSION claims to have spent more than \$600 million in aid to Bosnian Muslims impoverished by the country's recent civil war.

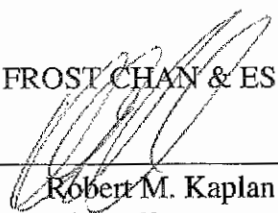
293. Despite the Saudi commission's generous efforts in Bosnia, it has been widely criticized by aid agencies and Bosnian intellectuals for importing the extreme form of Saudi Islam, Wahhabism, which is alien to the more moderate, secular form of Islam found in Bosnia. Bosnian officials claim that the Wahhabis' intolerant and anti-Western form of Islam contradicts and offends Bosnian tradition and undermines the country's rich and diverse religious heritage.

294. On October 21, 2001, five Algerians were arrested in Bosnia Herzegovina on criminal charges of international terrorism following a threat to the United States embassy. The incident resulted in the five day closure of the United States and British embassies for what both embassies called "a credible security threat." The plot was discovered when United States intelligence intercepted a telephone conversation between two of the accomplices about the

4. Such other and further relief as to this Court appears just and proper, together with pre and post judgment interest and the costs and disbursements of this proceeding.

Dated: New York, New York
August 30, 2004

FERBER FROST CHAN & ESSNER, LLP

By:  Robert M. Kaplan (R1216128)

Attorneys for Plaintiffs
530 Fifth Avenue, 23rd Floor
New York, New York 10036-5101
(212) 944-2200